

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,
Petitioner/Judgment Creditor
vs.
AVON CAPITAL, LLC,
Respondent/Judgment Debtor,
ASSET SERVICING GROUP, LLC,
Respondent, Garnishee,
SDM HOLDINGS, LLC,
Respondent/Garnishee,
and
AVON CAPITAL, LLC, a Wyoming Limited
Liability Company,
Intervenor.

Case No. 14-FJ-05-HE

PETITIONER'S MOTION FOR LEAVE TO FILE UNDER SEAL

This Court issued a Protective Order concerning document production in this proceeding on March 18, 2016. [Doc. # 38]. The Protective Order permits documents designated as “CONFIDENTIAL” to be filed with the Court, but mandates that any such documents be filed under seal. [Doc. # 38 at ¶ 6]. Universitas Education, LLC (“Universitas”) intends to file (1) a motion to apply Avon Capital, LLC’s (“Avon”) property toward Universitas’ judgment and (2) a motion to appoint a receiver to manage

Avon. In connection with these two motions, Universitas intends to file four confidential documents as exhibits.

Universitas intends to file two confidential documents in conjunction with its forthcoming Motion to Apply Property to Judgment. One proposed exhibit consists of the document production from Asset Servicing Group, LLC in connection with the recent hearing on assets. These documents provide updated information regarding the portfolio of policies at issue in this proceeding, including a list of active policies. These documents have been marked confidential and are subject to the Protective Order in this proceeding. [See Doc. # 38]. The second proposed exhibit is an appraisal of this same portfolio of insurance policies. The document has been marked confidential and is subject to the Protective Order in this proceeding. [See Doc. # 38].

Universitas also intends to file two confidential documents in conjunction with its forthcoming Motion to Appoint Receiver for Avon. One proposed exhibit is the 2020 balance sheet for SDM Holdings, LLC. The document has been marked confidential and is subject to the Protective Order in this proceeding. [See Doc. # 38]. The second proposed exhibit is the Operating Agreement for SDM Holdings, LLC. The document has been marked confidential and is subject to the Protective Order in this proceeding. [See Doc. # 38].

Petitioner accordingly brings this motion to file four exhibits under seal.

WHEREFORE, Petitioner respectfully requests that the Court permit Petitioner to file four exhibits under seal in conjunction with its forthcoming motions.

Respectfully submitted,

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ATTORNEYS FOR UNIVERSITAS
EDUCATION, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner
Joseph H. Bocock
Alan Rupe
Gerald Green
Melvin McVay
Clayton Ketter
Jeffrey Sandberg

/s/ Timothy F. Campbell